

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ALEXANDER RICE, Individually and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

GENWORTH FINANCIAL INCORPORATED,
THOMAS J. MCINERNEY, JAMES S. RIEPE,
WILLIAM H. BOLINDER, G. KENT
CONRAD, MELINA E. HIGGINS, DAVID M.
MOFFETT, THOMAS E. MOLONEY, JAMES
A. PARKE, DEBRA J. PERRY, and ROBERT
P. RESTREPO JR.,

Defendants.

Case No. 3:17-cv-00059-REP

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Alexander Rice and Brian James (the “Lead Plaintiffs”) hereby respectfully move this Court, pursuant to Fed. R. Civ. P. 23, for entry of the [Proposed] Order and Final Judgment¹ that will: (1) finally certify, for settlement purposes only, a non-opt-out class consisting of Lead Plaintiffs and any and all record holders and beneficial owners of any shares of Genworth Financial Incorporated at any time between and including October 23, 2016 through and including the date of consummation of the Merger or, if the Merger is not consummated for any

¹ A copy of the order and final judgment is attached as Exhibit D to the Stipulation and has also been filed as a separate attachment for the convenience of the Court.

reason by the date of the Final Approval Hearing, March 7, 2017;² and (2) finally approve the terms of the settlement (the “Settlement”) set forth in the Stipulation of Settlement dated April 12, 2018 (the “Stipulation”).

In support of this motion, Lead Plaintiffs submit herewith a memorandum of law and the Declaration of Scott A. Simmons in Support of Lead Plaintiffs’ Motion for Final Approval of Settlement, which contains the Stipulation with all attachments, and the Order and Final Judgment.

DATED: June 1, 2018

Respectfully submitted,

MEYERGOERGEN PC

/s/ Scott A. Simmons
Scott A. Simmons (VSB 37744)
Christopher J. Habenicht (VSB 15146)
1802 Bayberry Court, Suite 200
Richmond, VA 23226
Tel: 804-288-3600
Fax: 804-565-1231
Email: simmons@mg-law.com
Email: habenicht@mg-law.com

Liaison Counsel for Lead Plaintiffs

OF COUNSEL

FARUQI & FARUQI, LLP

James M. Wilson, Jr.
685 Third Ave., 26th Fl.

² Including their respective successors in interest, successors, predecessors in interest, predecessors, representatives, trustees, executors, administrators, heirs, assigns or transferees, immediate and remote, and any person or entity acting for or on behalf of, or claiming under, any of them, and each of them, but excluding Defendants, their subsidiaries or other affiliates, their assigns, members of their immediate families, officers of Genworth Financial Incorporated, and the legal representatives, heirs, successors, or assigns of any such excluded person (the “Settlement Class”).

New York, NY 10017
Tel.: 212-983-9330
Fax: 212-983-9331
Email: jwilson@faruqilaw.com

KAHN SWICK & FOTI, LLC

Michael J. Palestina, Esq.
206 Covington Street
Madisonville, LA 70447
Tel.: 504-455-1400
Fax: 504-455-1498
Email: Michael.Palestina@ksfcounsel.com

Co-Lead Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on June 1, 2018, the undersigned attorney filed the foregoing documents using the CMF ECF system which sent notification of such filing to all registered users.

/s/Scott A. Simmons